

EXHIBIT 13

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)

6 LITIGATION) Case No.
7) 1:17-MD-2804

8 THIS DOCUMENT RELATES TO) Hon. Dan A. Polster
9 ALL CASES)

10 Friday, December 14, 2018

11
12 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
13 CONFIDENTIALITY REVIEW

14
15
16 Videotaped Deposition of PATSY LITTLE,
17 held at Stone Pigman Walther Wittmann LLC,
18 909 Poydras, Suite 3150, New Orleans,
19 Louisiana, commencing at 8:06 a.m., on the
20 above date, before Michael E. Miller, Fellow
21 of the Academy of Professional Reporters,
22 Registered Diplomate Reporter, Certified
23 Realtime Reporter and Notary Public.

24 GOLKOW LITIGATION SERVICES
25 877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

2 I worked at St. Elizabeth Hospital and I
3 worked for Infusion Network.

5 Then in 2005 you went to
6 Louisiana State to get your master's degree,
7 correct?

9 Q. Did you begin working with
10 Walmart directly after graduating with your
11 master's degree?

14 Q. And what were you hired at
15 Walmart to do?

16 A. To be a buyer in the pharmacy
17 department.

The diagram illustrates a sequence of 10 rows of data. Each row is represented by a vertical bar on the left and a horizontal bar on the right. The horizontal bars vary in length and position, indicating different data values for each row. The rows are numbered 1 through 10.

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■ [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

8 Q. What's your basis for that
9 statement?

10 A. Because we never did anything
11 that would promote an opioid to the customer,
12 to the end customer user, the patient that
13 would pick up the prescription.

14 Q. And how do you know that?

15 A. Because we had a pretty firm
16 stance on that while I was there.

17 Q. And where did you learn of that
18 stance?

19 A. I had asked to put a cough
20 medicine on the \$4 program at one time and
21 was told that anything with controlled
22 substances, we generally would not advertise
23 or talk to the consumer about.

■ [REDACTED]
■ [REDACTED]

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